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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

IMAGIMED LLC,

Chapter 11
Case No. 14-22415 (RDD)

Debtor.

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In re:

OPEN MRI OF BREWSTER, LLC,

Chapter 11
Case No. 14-22416 (RDD)

Debtor.

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In re:

OPEN MRI OF DEWITT, LLC,

Chapter 11
Case No. 14-22417 (RDD)

Debtor.

-----X

In re:

OPEN MRI OF FISHKILL, LLC,

Chapter 11
Case No. 14-22418 (RDD)

Debtor.

-----X

In re:

OPEN MRI OF MIDDLETOWN, LLC,

Chapter 11
Case No. 14-22419 (RDD)

Debtor.

-----X

In re:

OPEN MRI OF TARRYTOWN, LLC,

Chapter 11
Case No. 14-22414 (RDD)

Debtor.

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In re:

OPEN MRI OF WILLIAMSPORT, LLC,

Chapter 11

Case No. 14-22410 (RDD)

Debtor.

-----X

In re:

OPEN MRI OF YORKTOWN, LLC,

Chapter 11

Case No. 14-22411 (RDD)

Debtor.

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**MOTION OF THE DEBTORS PURSUANT TO RULE 1015(b)
OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE
FOR ENTRY OF AN ORDER DIRECTING THE JOINT
ADMINISTRATION OF THE CHAPTER 11 CASES**

The above captioned debtors and debtors-in-possession (collectively, the "Debtors"), by their proposed attorneys, DelBello, Donnellan, Weingarten, Wise & Wiederkehr, LLP, file this motion (the "Motion") for an entry of an order directing the joint administration of the Chapter 11 cases, respectfully state and represent as follows:

JURISDICTION

1. This Court has jurisdiction over this Motion under 28 U.S.C. §§ 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue of these proceedings and this Motion is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory bases for the relief requested herein are §§ 105(a) of Title 11 of the United States Code (the "Bankruptcy Code"), and Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules").

BACKGROUND

3. On April 1, 2014, each of the Debtors filed a voluntary petition for relief under

chapter 11 of the Bankruptcy Code (the “Chapter 11 Cases”).

4. Imagimed, LLC (“Imagimed”) is a magnetic resonance imaging (MRI) diagnostic testing company.

5. Imagimed owns a majority share in each of the other Debtors. The affiliated Debtors hold valuable leases for MRI facilities in Westchester, Putnam, Orange, Dutchess and Onondaga counties in New York, and in Lycoming County Pennsylvania at which Imagimed operates.

RELIEF REQUESTED

6. In order to provide for the most efficient administration of the Chapter 11 Cases, as well as to carry out and properly administer the Debtors’ bankruptcy proceedings, by this Motion the Debtors seek entry of an order pursuant to Bankruptcy Rule 1015(b) authorizing the joint administration, for procedural purposes only, under the case number assigned to Roma 380 Equities Corporation.

JOINT ADMINISTRATION OF THESE CASES IS WARRANTED

7. Bankruptcy Rule 1015(b) provides, “[i]f... two or more petitions are pending in the same court by or against ...a debtor and an affiliate, the court may order a joint administration of the estates.” See Fed. R. Bankr. P. 1015(b). The Debtors are “affiliates” as that term is defined under section 101(2) of the Bankruptcy Code. Accordingly, this Court is authorized to grant the relief requested herein.

8. Many of the motions, hearings and orders that will arise in the Chapter 11 Cases will jointly affect both Debtors. By jointly administering the Chapter 11 Cases, the Debtors will be able to reduce fees and costs resulting from the administration of these cases and ease the onerous administrative burden of having to file multiple and duplicative documents.

9. The Debtors will continue to operate as separate and distinct legal entities, and propose to continue to maintain their books and records as set forth above, consistent with their prepetition practices.

10. Entry of an order directing the joint administration of the Chapter 11 Cases will avoid duplicative notices, applications, and orders, thereby saving the Debtors considerable time and expense. The rights of the creditors will not be adversely affected as this Motion requests only administrative, and not substantive, consolidation of the Debtors' estates. The rights of all creditors will be enhanced by the reduced costs that will result from the joint administration of the Chapter 11 Cases. The Court also will be relieved of the burden of entering duplicative orders and maintaining duplicative files. Finally, supervision of the administrative aspects of the Chapter 11 Cases by the Office of the United States Trustee for the Southern District of New York will be simplified.

11. Accordingly, the Debtors request that the caption of the Chapter 11 Cases be modified to reflect the joint administration of such cases, as follows:

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

IMAGIMED LLC,

Chapter 11
Lead Case No. 14-22415 (RDD)

Debtor.

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12. The Debtors also seek the Court's direction that a notation substantially similar to the following notation be entered on the docket of each of the Debtors to reflect the joint administration of these cases:

"An order has been entered in this case directing the procedural consolidation and joint administration of the Chapter 11 cases commenced

by Imagimed, LLC, Open MRI of Brewster LLC, Open MRI of DeWitt LLC, Open MRI of Fishkill LLC, Open MRI of Middletown LLC, Open MRI of Tarrytown LLC, Open MRI of Williamstown LLC, and Open MRI of Yorktown LLC. The docket in Case No. 14-22415 (RDD) should be consulted for all matters affecting the above listed cases.”

NOTICE

13. Notice of this Application has been provided to (i) Office of the United States Trustee; (ii) the Debtors’ twenty (20) largest unsecured creditors; (iii) the Debtors’ five (5) largest secured creditors; and parties who have filed notices of appearance. The Debtors submit that said notice is adequate and proper.

14. No previous application for the relief herein requested has been made to this or any other Court.

WHEREFORE, the Debtors respectfully requests the Court to enter an order substantially in the form annexed hereto as Exhibit A directing the joint administration of the Chapter 11 cases under the case number assigned to Imagimed, LLC and such other and further relief as may be just and proper.

Dated: White Plains, New York
April 1, 2014

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By: /s/ Dawn Kirby Arnold
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